

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

DHD Jessamine, LLC,)
)
Plaintiff,)
)
and)
)
William D. Tallevast, V.,)
)
Intervenor-Plaintiff,)
)
v.)
)
Florence County, South Carolina; Frank J.)
Brand; Jason Springs; Roger M. Poston;)
Alphonso Bradley; Jerry W. Yarborough;)
Stoney C. Moore; Waymon Mumford;)
and Willard Dorriety, Jr. as the elected)
members of the Florence County Counsel;)
and John Does 1-15,)
)
Defendants.)
_____)

Civil Action Number:
4:22-cv-01235-JD

**GOVERNMENTAL DEFENDANTS'
DISCLOSURE OF EXPERT WITNESSES
UNDER RULE 26(a)(2)**

TO: J. TAYLOR POWELL, COUNSEL FOR PLAINTIFF DHD JESSAMINE, LLC AND ROSS
APPEL, COUNSEL FOR INTERVENOR-PLAINTIFF WILLIAM D. TALLEVAST, V:

Pursuant to Rule 26 (a)(2), FRCP, and this Court's Scheduling Order, the
Governmental Defendants identify the following experts in this matter:

1. **Phil Lindler, AICP**
Owner, Lindler Planning Consultants
228 Chatham Drive
Greenwood, South Carolina 29649
(864)941-0376

Mr. Lindler is an expert in Governmental Planning and Zoning, and he is expected to testify in accordance with his report and the opinions contained therein. His qualifications, background, and compensation are contained in Page 16 of his report. To the knowledge of these Defendants, he has not testified as a witness in any trial or Deposition during the last four years, nor does he have any publications or presentations within the last 10 years. These Defendants will supplement this response if necessary.

Governmental Defendants certify that a copy of this expert's report has been served upon opposing counsel in this case.

**2. Rodney K. Dooley, Jr. CPA, PFS, CFF
President, Dooley and Company, LLC
468 Old Cherokee Road
Lexington, South Carolina, 29072
(803)359-3800**

Mr. Dooley is an expert in accounting, and he is expected to testify in accordance with his report and the opinions contained therein. His background and qualifications are contained in his resume, which is attached hereto as Exhibit A. He is being compensated at a rate of \$275 - \$375 an hour. Defendants will supplement a list of Mr. Dooley's cases in the last 4 years, as well as his publications or presentations in the last 10 years, if any.

Governmental Defendants certify that a copy of this expert's report has been served upon opposing counsel in this case.

3. Governmental Defendants also designate any experts designated by another party who are qualified to present testimony and who are not objected to at trial by Governmental Defendants and reserve the right to call such experts or the experts designated above for purposes of impeachment.

Governmental Defendants reserve the right to supplement this disclosure as discovery progresses, including but not limited to the depositions of any individuals yet to be deposed, and the receipt of additional records or information.

Respectfully submitted,

DAVIDSON, WREN & DEMASTERS, P.A.

s/John Pyatt Grimes, Jr.

William H. Davidson, II, #425

John P. Grimes, Jr. #13808

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Defendants*

Columbia, South Carolina

October 5, 2023